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§13–516.

- (a) To appeal to the Tax Court, a person or governmental unit shall file with the Tax Court a written petition that states succinctly:
 - (1) the nature of the case;
 - (2) the facts on which the appeal is based; and
 - (3) each question presented for review by the Tax Court.
- (b) An opposing party shall respond in accordance with the rules of procedure of the Tax Court.

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